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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

Ventzislava Stankova,

Plaintiff,

v.

Trans Union LLC; National Consumer Telecom
& Utilities Exchange, Inc.; Clarity Services, Inc.
and First Premier Bank,

Defendants.

Case No. 2:25-cv-00415-CDS-DJA

JOINT MOTION

**~~STIPULATION~~ AND PROPOSED
ORDER TO EXTEND TIME TO
RESPOND TO THE COMPLAINT
(FIRST REQUEST)**

Plaintiff Ventzislava Stankova and Defendant First Premier Bank (“First Premier”), by and through their respective counsel, stipulate and agree to an extension of time for First Premier to respond to the Complaint to allow it time to further investigate plaintiff’s allegations and for the parties to explore potential resolution. Accordingly, pursuant to LR IA 6-1 and 6-2, it is hereby stipulated and agreed to by counsel that First Premier’s time to respond to the Complaint is extended from March 31, 2025, to April 30, 2025. This is First Premier’s first request to extend time to respond to the complaint, and this stipulation is filed in good faith and not intended to cause delay.

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1 **IT IS SO STIPULATED.**

2 DATED this 28th day of March 2025.

DATED this 28th day of March 2025.

3 **GREENBERG TRAURIG, LLP**

FREEDOM LAW FIRM

4
5 /s/ Alix Goldshtein

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10 Under Local Rule 7-1(c), a stipulation that has been signed by fewer than all the parties or their
11 attorneys will be treated - and must be filed - as a joint motion. The Court thus treats this filing as
12 a joint motion and will expect that future filings follow Local Rule 7-1(c). The Court GRANTS
13 the joint motion (ECF No. 7). IT IS SO ORDERED.

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15 **HONORABLE DANIEL J. ALBREGTS**
16 **UNITED STATES MAGISTRATE JUDGE**

17 **DATED:** 3/31/2025
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